

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 1:15-cv-10050-NMG

DANIEL THIBEAULT

GL CAPITAL PARTNERS, LLC

GL INVESTMENT SERVICES, LLC

GRADUATE LEVERAGE, LLC (d/b/a GL

ADVISOR and GL HOLDINGS CORP.)

TAFT FINANCIAL SERVICES, LLC,

Defendants,

and

SHAWNET THIBEAULT

GL ADVISOR SOLUTIONS, INC.

Relief Defendants.

---

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AS TO  
DEFENDANT GRADUATE LEVERAGE, LLC**

The plaintiff Securities and Exchange Commission ("the Commission") hereby moves, pursuant to Fed. R. Civ. P. 55(b)(2), for entry of default judgment as to defendant Graduate Leverage, LLC.

In support of this motion, the Commission submits the accompanying memorandum of law and a declaration by Rory Alex. Also filed herewith is a proposed form of Final Judgment as to Graduate Leverage, LLC.



Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION  
By its attorneys,

/s/ Marc J. Jones

Marc J. Jones (Mass. Bar No. 645910)

Senior Trial Counsel

Rebecca Israel

Senior Investigations Counsel

Kathleen Shields (Mass. Bar No. 637438)

Senior Trial Counsel

Attorneys for Plaintiff

SECURITIES AND EXCHANGE COMMISSION

33 Arch Street, 24th Floor

Boston, MA 02110

(617) 573-8947 (Jones direct)

(617) 573-4590 (fax)

jonesmarc@sec.gov (Jones email)

DATED: September 23, 2016

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

The undersigned was unable to confer with defendant Graduate Leverage, LLC because it is not represented by counsel and no individual has been authorized to represent it in this matter.

/s/ Marc J. Jones

Marc J. Jones

**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2016, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. A copy will also be sent via first class mail to the last known address for defendant Graduate Leverage, LLC, and other defendants and relief defendants who have not yet registered for notice via the Court's CM/ECF system.

/s/ Marc J. Jones

Marc J. Jones